



**Testimony of Natalie Avery  
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District of Columbia Zoning Commission  
441 4th St NW #200  
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Friendship Heights Alliance  
Supplemental Testimony, Zoning Commission Case 25-13

Thank you for the opportunity to submit supplemental testimony on Case 25-13. My name is Natalie Avery, and I serve as Executive Director of the Friendship Heights Alliance. I write today to build on the testimony I submitted in December and to address the additional recommendations in OP's Supplemental Report, particularly the potential addition of a discretionary design review process.

In our December testimony, the Alliance shared what we have been hearing through extensive community engagement. An overwhelming majority of residents have expressed the desire to see more homes and housing types, more retail vibrancy, and a more walkable public realm in Friendship Heights. Adding the capacity to build more housing is instrumental to all of those goals.

**IZ+ and Project Feasibility**

The Friendship Heights Alliance has submitted research and analysis documenting the impact of IZ+ on project feasibility along this corridor. That analysis demonstrates that the affordability requirements embedded in the proposed zoning will be materially more stringent than what applies today. Properties along the corridor already carry IZ obligations, but the shift to IZ+ represents a significant increase in required set-asides, applied on top of the other cost pressures the new design standards introduce.

We note that OP has committed to further study of IZ+ as part of this process, and we supported resisting calls to increase IZ requirements beyond what is already proposed. We want to put clearly on the record, however, that IZ+ as currently structured is itself a feasibility constraint on this corridor, not a neutral baseline.

IZ+ was calibrated during a period of historically low interest rates, compressed cap rates, and readily available construction financing. Those conditions made marginal feasibility thresholds workable. They no

longer exist. Applying more demanding affordability requirements to a market defined by elevated interest rates, high construction costs, and a sharply thinning development pipeline is not a neutral act.

The DC Policy Center's recent report "Breaking the Scarcity-Subsidy Cycle" is instructive here. It documents that over seventeen years, the citywide IZ program has produced fewer than 300 units annually, and characterizes IZ as functioning in practice as a tax on new housing, one that raises market-rate rents, increases construction costs, and in weaker or marginal markets can determine whether a project proceeds at all. We'd like to bring that report to the Commission's attention.

We continue to believe that the goal of creating affordable homes in Friendship Heights is both important and achievable. The real-world examples that have worked, including the Lisner Louise project, share a common feature: they succeeded through layered public and private financing, not through zoning requirements alone. IZ is one tool, but it cannot be the primary mechanism on a corridor where development feasibility is already marginal. Achieving meaningful affordability outcomes will require the city to pursue other financing strategies alongside zoning.

### **Discretionary Design Review**

That same feasibility reality makes the design review question inseparable from the affordability question. As Somerset Development has argued in supplemental testimony, the design review requirement as structured will make it nearly impossible for affordable housing projects to advance on this corridor. Affordable housing development depends on complex, time-sensitive, layered financing. An open-ended discretionary hearing is not a minor inconvenience in that context; it is a project-killing constraint. A zoning regime that simultaneously increases affordability requirements and layers on discretionary review risks producing less housing, affordable and otherwise. We note for the Commission's consideration Somerset's proposal to exempt projects with 33% or more affordable units from the design review process, which mirrors the existing framework in Comprehensive Plan Policy 2503.3.

The Friendship Heights Alliance supports good design. We have invested years of community engagement and professional planning work in developing a Vision Framework that articulates shared aspirations for a more walkable, connected, and vibrant neighborhood with the capacity to welcome a diversity of neighbors. The question is not whether design matters. The question is whether a discretionary design review process can reliably produce it without undermining the development feasibility that makes any of this possible.

The Wisconsin Avenue corridor is not a master-planned site. It is a collection of parcels under different ownership, many modest in scale, where the more ambitious design elements contemplated by the Development Framework cannot be replicated project by project. What discretionary review introduces on a corridor like this is subjectivity, extended timelines, and financing uncertainty.

The two sites with the greatest transformative potential, the Western Bus Garage at 5230 Wisconsin Avenue and the Lord & Taylor building, illustrate the concern most sharply. A landmark nomination for the

Western Bus Garage was submitted by the DC Preservation League and the Tenleytown Historical Society in 2023. A historic landmark nomination for the Lord & Taylor building is separately pending. Both sites will already have to navigate historic preservation review alongside the operational, environmental, and financial complexity inherent in large-scale redevelopment.

Realizing the potential of either site will require substantial public-private partnership. Land assembly, environmental remediation, infrastructure investment, and high quality urban design do not emerge from zoning orders alone. They require patient capital, public investment, aligned city agency commitments, and financing structures that depend on timeline certainty. Adding a mandatory discretionary design review process to that existing complexity introduces additional risk without a commensurate guarantee of better outcomes.

This concern applies across the corridor, not only on the large sites. For decades, the discretionary approval process has introduced delay and uncertainty into projects on this corridor. A mandatory design review requirement risks perpetuating that pattern rather than breaking it. The two significant residential projects that have delivered in recent years, Mazza Residences and Lisner, succeeded in part because they were able to move through the approval process before market conditions deteriorated. They illustrate what becomes possible when the path is clear and financing is actionable.

### **Achieving a High-quality Public Realm**

The deepest challenges in our public realm cannot be solved through zoning alone. Wisconsin Avenue is a six-lane highway that bisects our neighborhood and sits on DC's High Injury Network. Pedestrian crossings are too long, the tree canopy too thin, and the pedestrian environment dominated by cars. Addressing this will require holistic, city-led investment in the streetscape itself, separate from and beyond what any individual development project can be asked to contribute.

Friendship Heights also has no public parks or publicly owned land, though it sits within walking distance of several green spaces whose connections are largely invisible and difficult to navigate on foot. City investment in pedestrian routes and wayfinding linking the corridor to surrounding green spaces would contribute meaningfully to the livability residents seek.

A well-designed public gathering space would also transform this neighborhood. But zoning and design review, however thoughtfully applied, cannot produce publicly accessible, flexibly programmed, permanently maintained civic space at the scale this neighborhood needs. That requires public investment, dedicated funding, or structured public-private partnerships with real enforceable commitments. The creation of these spaces runs parallel to the zoning process, not through it.

### **Conclusion**

Friendship Heights has never fully realized its potential as a transit-oriented neighborhood. It sits at a Red Line station with direct connections to two jurisdictions and decades of pent-up demand for housing and walkable urban life. The neighborhood was downzoned in the 1970s on the eve of Metro's opening, a

decision that foreclosed the kind of growth and investment that should have followed naturally from that infrastructure. We continue to live with those consequences. A neighborhood with a Metro station with five entrances, exceptional transit access, and enormous untapped capacity has produced almost no new housing in a generation. That is not a market failure. It is a policy failure, accumulated over decades and still compounding.

This rezoning is an opportunity to begin correcting that record. The research and analysis the Alliance has submitted documents the feasibility constraints that design review requirements and IZ+ obligations introduce, particularly under current market conditions. The dedicated affordable housing, the streetscape improvements, the pedestrian connections and civic gathering spaces this neighborhood needs will not emerge from a zoning order alone. They will require creative financing, genuine partnership with city agencies, and sustained organizational work. The Friendship Heights Alliance is committed to that work, and all of it depends on a development pipeline that is moving.

We offer this research and analysis in the hope that it contributes to the Commission's deliberations. The Friendship Heights Alliance remains available to the Commission and to OP as this process continues.

Thank you for the opportunity to submit this testimony.



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